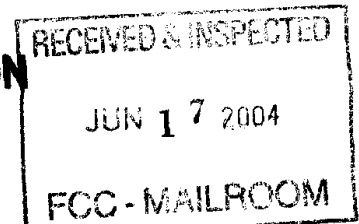


ORIGINAL

**Before The  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C.**



In the Matter of )

Amendment of Section 73.202(b) )

Table of Allotments, )

FM Broadcast Stations. )

(Lake Havasu City, Arizona and Pahrump, )  
Nevada) )

MB Docket No. 04-224

RM-10853

RM-10854

**COMMENTS OF REC NETWORKS**

1. REC Networks ("REC") is a supporter of locally owned and diverse radio. REC currently operates several Internet only radio stations. REC also operates several websites including the original LPFM Channel Search Tool<sup>1</sup>. REC Networks also represents the interests of independently owned Low Power FM ("LPFM") broadcast stations and their listeners. REC also follows issues that involve the availability of media in rural and underserved areas especially within our area of interest of Southern California, Nevada and Arizona.

2. The Commission now has before it two mutually exclusive proposals, both of which would provide Pahrump, Nevada with it's third aural service. The proposal by SSR Communications ("SSR Proposal") would add Channel 272C3 to Pahrump. The proposal by Steven M. Greeley ("Greeley Proposal") would substitute Channel 272C at Pahrump for Channel 272B in Lake Havasu City, AZ.

3. REC has reviewed both proposals and we feel that the SSR Proposal would better meet the public interest for the reasons herein.

4. Pahrump is located in a valley with a significant terrain obstruction (Mt. Charleston) to the east that physically blocks the station from the Las Vegas Urbanized

<sup>1</sup> - <http://www.recnet.com/lpfminfo>

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Area. To the west are the very small towns of Tecopa and Shoshone. To the northwest is the Death Valley National Park. Besides Pahrump, there are no other significant population centers within the valley. REC feels that a Class C3 station can very well saturate the entire Pahrump Valley with the same quality signal that a full Class C would provide in the same area.

5. The Class C station proposed by Greeley would only result in radiation of signals into significant area where there is no population and no significant thoroughfares. The Class C allotment at Pahrump could also significantly prevent the expansion of LPFM stations in the rural portions of Southern California and Nevada.

6. REC is also concerned that even though the facility proposed by Greeley would not physically radiate on it's own into the Las Vegas area, the proposed station's 60 dBu protected contour would fall significantly into the Las Vegas metropolitan area. This opens the door for boosters<sup>2</sup> to be placed in Las Vegas and as we have seen with KXTE(FM), programming a Pahrump, NV station to the Las Vegas market while completely ignoring the city of license<sup>3</sup>. In this case, the station would depend on it's boosters for a significant amount of it's listeners and advertising revenue. Such a situation can't happen with the SSR proposal.

7. Another benefit of the SSR Proposal is that it will not reduce the number of FM broadcast stations in Lake Havasu and the Lower Colorado River Valley areas. With the Greeley proposal, the Havasu area would lose a station while Pahrump would pick up a new station that would blast signals into the sides of mountains.


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<sup>2</sup> - See §74.1321(h).

<sup>3</sup> - Rich Eyre of REC Networks filed comments in support of the allotment proceeding that gave Pahrump it's second aural service (the allotment that is currently where KNYE is now). In our comments, we supported the allotment because it was a Class A allotment and had no way of providing service into the Las Vegas urbanized area. See MM Docket 95-45. REC feels that the SSR Proposal, a Class C3 would provide a similar service area within the Pahrump Valley without and potential of service into the Las Vegas Urbanized area.

8. Based on the information presented, REC requests that the Commission **GRANT** the SSR Proposal over the Greeley Proposal and allot Channel 272C3 to Pahrump, NV as their third aural service.

Respectfully Submitted,



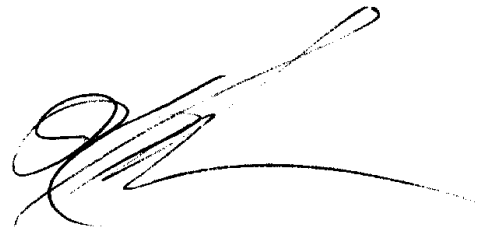
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**CERTIFICATE OF SERVICE**

This is to certify that a copy of this pleading has been served via US Mail upon the petitioners:

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## APPENDIX A

